

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

NOTICE OF MOTION

v.

DMITRIY YAKOVLEV

S-1 09 CR. 587 (ILG)

Defendant.

S I R S:

Please take notice that upon the attached Affidavit of Michael H. Gold, Esq., and the accompanying Memorandum of Law and all prior pleadings and proceedings, the defendant Dmitriy Yakovlev will move before the Honorable I. Leo Glasser, United States District Court Judge, at the Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, on October 8, 2010, for an Order 1) pursuant to Rule 12 and 41 suppressing evidence seized from 4614 Surf Avenue, Brooklyn New York; 2) pursuant to Rule 12 and Rule 41 suppressing all evidence seized from a white 2004 Lexus LX470 with New York license plate number BWX 1907; 3) granting a Motion in Limine to preclude the introduction of body parts photographs and forensic evidence obtained from the body parts; 4) suppression of all evidence seized from body parts and bags; 5) in the alternative a hearing to suppress said evidence and, 6) additional time to file motions required by the subsequent production of promised discovery and other materials and for such other and further relief as the Court deems just and proper.

Dated: New York, New York
September 17, 2010

Yours, etc.,

Michael H. Gold
Attorney for Defendant
Dmitriy Yakovlev
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New York, New York 10118
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To: Clerk of the Court
James Gatta
Assistant United States Attorney